

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**MAKAYLA DARRIELLE SAULNY,
On behalf of herself and all
Other Mississippi citizens similarly situated,**

Plaintiff,

**CASE NO. 3:24-cv-00619-HTW-LGI.
CLASS REPRESENTATION**

vs.

**VGW HOLDINGS LIMITED, VGW
MALTA LIMITED, VGW LUCKYLAND INC.,
VGW GP LIMITED, VGW HOLDINGS US INC.,
VGW US INC.**

Defendants.

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MOTION TO AMEND COMPLAINT

Plaintiff, MAKAYLA DARRIELLE SAULNY, by and through the undersigned counsel, pursuant to Fed. R. Civ. P. 15 requests that she be allowed to submit the proposed Amended Complaint (Attachment “1”) and in support would state the following:

1. This is Plaintiff’s first request to amend the Complaint.
2. Plaintiff’s proposed Amended Complaint (Attachment “1”) includes additional facts and details to show that this Court has personal jurisdiction over the

Defendants. It also adds 2 defendants, VGW HOLDINGS US INC. and VGW US INC.

3. Acceptance of Plaintiff's proposed Amended Complaint does not unduly prejudice Defendants.

4. Plaintiff's request to submit a proposed Amended Complaint is appropriate and is not futile.

5. At this stage of the proceedings allowing Plaintiff to submit an Amended Complaint will better assist the Court in assessing this case determining whether the Court has personal jurisdiction over the Defendants.

6. Plaintiff submits that the arguments and authority cited in the memorandum of law filed contemporaneously with this motion further establish that the proposed Amended Complaint is appropriate to file with the Court and to allow Defendants to respond.

WHEREFORE, Plaintiff, MAKAYLA DARRIELLE SAULNY, requests that the Court permit the attached Amended Complaint (Attachment "1") be accepted by the Court, and that the Court grant other just and appropriate relief.

Certificate of Attempt To Confer

Counsel for Plaintiff conferred with opposing counsel via email on the 23rd day of April 2025, and counsel for Defendants expressed objections to the motion and stated that Defendants intend to file a response within the time allotted by the rules.

Respectfully submitted,

/s/ Dennis Wells

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Makayla Darrielle Saulny

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of April 2025, I electronically filed the foregoing with the Clerk of the Court by using the CMECF system which will serve a copy of the foregoing by e-mail to Defendants' counsel:, J. Carter Thompson, Jr. at cthompson@bakerdonelson.com, and Gregory D. Beaman (pro hac vice) at gbeaman@orrick.com, and Behnam Dayanim (pro hac vice), at Bdayanim@orrick.com

/s/ Dennis Wells

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